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August 21, 2025

**Via ECF**

The Hon. J. Paul Oetken, U.S.D.J.  
United States District Court, Southern District of New York  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

**Re: Richard Arjun Kaul, M.D. v. Center for Personalized Education for  
Physicians, et al.  
Civil Action No.: 1:21-cv-06992-JPO**

Dear Judge Oetken:

This firm represents Defendant Robert Heary ("Dr. Heary") in the above-referenced matter. Please accept this correspondence as a joint letter on behalf of Defendants Dr. Heary, Allstate Insurance Company, Federation State Medical Boards, Christopher J. Christie and Daniel Stolz (collectively "Defendants").

As Your Honor will recall, Your Honor ordered on the return date of an Order to Show Cause on June 17, 2025, that Plaintiff Richard A. Kaul ("Plaintiff") be held in contempt for repeated violations of this Court's September 12, 2022, anti-filing injunction (the "Anti-Filing Injunction"). Your Honor stated the Court would enter an Order awarding Defendants attorneys' fees and costs for all matters filed by Plaintiff in violation of the Anti-Filing Injunction and that Defendants would be given sixty (60) days from the date of the Order to submit certifications detailing Defendants' attorneys' fees and costs. The Court further provided that Plaintiff would be given a final opportunity to avoid arrest and detention by withdrawing all cases filed in violation of the Anti-Filing Injunction. Enclosed is a copy of the transcript from the June 17, 2025, proceeding.

We write to respectfully request an update on the status of the above-mentioned Order. As Your Honor may be aware, Plaintiff has filed another lawsuit against Your Honor and the attorneys representing the Defendants in this matter. See, Kaul v. Oetken, et al., Civil Action No. 1:25-cv-06495.



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In the alternative, and if the Court would prefer, Defendants will prepare and submit a proposed form of order for the Court's consideration.

We thank the Court for its kind courtesies.

**Respectfully submitted,**

**NORRIS McLAUGHLIN, P.A.**

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**Norris McLaughlin, P.A.**

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